Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Comprehensive Review of Universal Service Fund Management, Administration, and Oversight	)	WC Docket No. 05-195
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Schools and Libraries Universal Service Support Mechanism	)	CC Docket No. 02-6
	)	
Rural Health Care Support Mechanism	)	WC Docket No. 02-60
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Changes to the Board of Directors for the National Exchange Carrier Association, Inc.	)	CC Docket No. 97-21

NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION REPLY COMMENTS

NATIONAL TELECOMMUNICATIONS
COOPERATIVE ASSOCIATION

Richard J. Schadelbauer
Economist

Dorie Pickle
Analyst

Daniel Mitchell
Karlen J. Reed
Its Attorneys

4121 Wilson Boulevard, 10th Floor
Arlington, VA 22203
(703) 351-2000

December 19, 2005

TABLE OF CONTENTS

PAGE

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Comprehensive Review of Universal Service Fund Management, Administration, and Oversight	)	WC Docket No. 05-195
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Schools and Libraries Universal Service Support Mechanism	)	CC Docket No. 02-6
	)	
Rural Health Care Support Mechanism	)	WC Docket No. 02-60
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Changes to the Board of Directors for the National Exchange Carrier Association, Inc.	)	CC Docket No. 97-21

REPLY COMMENTS
OF THE
NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The National Telecommunications Cooperative Association (NTCA)[1] submits these reply comments in response to the initial comments filed on October 18, 2005, as part of the Federal Communications Commission's (Commission or FCC) Notice of Proposed Rulemaking released June 14, 2005 (NPRM) seeking comment on proposed rules and conclusions regarding the Universal Service Fund (USF) management and administrative structure in the above-

[1] NTCA is the premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents more than 560 rural rate-of-return regulated telecommunications providers. All of NTCA's members are full service incumbent local exchange carriers (ILECs) and many of its members provide wireless, cable, Internet, satellite and long distance services to their communities. Each member is a "rural telephone company" as defined in the Communications Act of 1934, as amended (Act). NTCA's members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

referenced docket.[2] NTCA's silence on any positions raised by parties in this proceeding connotes neither agreement nor disagreement with their positions or proposals. Unless specifically stated below, NTCA reasserts its positions described in its October 18, 2005 initial comments filed in this docket.

I. INTRODUCTION AND SUMMARY

NTCA submits the following reply comments focusing on critical aspects expressed in the initial comments to this docket regarding the high cost support program, the low-income support program, and program audits. NTCA contends that the Commission does not need to make sweeping changes to the high cost support program because this highly successful program already operates efficiently.

As with any successful program, modifications for the sake of improvement should not be coupled with discarding effective measures. The Commission should retain the current high cost loop reporting and certification requirements and should not consolidate rural ILEC study areas. Any high cost program performance measures the Commission may choose to adopt should reflect rural ILEC constraints. The Commission can tighten USF high cost oversight by eliminating the identical support rule. Rural ILECs should not be penalized for inaccurate USF high cost forecasts.

The low-income program, which has not achieved the high penetration rate of the high cost program needs some changes. One suggestion is to match the documentation retention

---

[2] *In the Matter of Comprehensive review of Universal Service Fund Management, Administration and Oversight,* WC Docket No. 05-195: *Federal-State Joint Board on Universal Service,* CC Docket No. 94-65, *Schools and Libraries Universal Service Mechanism,* CC Docket No. 02-6, *Rural Health Care Support Mechanism,* WC Docket No. 02-60, *Lifeline and Link-Up,* WC Docket No. 03-109, *Changes to the Board of Directors for the National Exchange Carrier Association, Inc.,* CC Docket No. 97-21, FCC 05-124, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking (rel. June 14, 2005) (NPRM).

period to the three-year audit period to maximize auditing efficiency. While NTCA shares the Commission's concern about customers receiving multiple Lifeline supported services, NTCA does not support TracFone's proposal to impose its tracking system on all Lifeline support providers.

New audit measures are, in large part, unnecessary for high cost and low-income support programs because program participants are already subjected to oversight by federal and state agencies. Any new audit requirements should be imposed sparingly in light of constrained Commission and carrier resources. The Commission should consider the costs that carriers must bear associated with audits. To minimize those costs and maximize audit effectiveness, the Commission should limit the time period to hold an audit open to six months and should use risk assessment triggers for USF beneficiaries and contributors. Finally, NTCA urges the Commission to allow service providers to participate in all phases of a service carrier or customer audit, including an opportunity to present comment on draft audit reports to the USAC Board.

II. THE COMMISSION SHOULD RETAIN MOST OF THE HIGH COST SUPPORT PROGRAM STRUCTURES BUT SHOULD CONSIDER SEVERAL REVISIONS.

A. Current HCL reporting and certification requirements are generally adequate.

NTCA agrees with the National Exchange Carrier Association's (NECA) recommendation that the Commission should retain existing high-cost loop (HCL) reporting and certification requirements.[3] These requirements have proven to be effective, and do not place undue burden upon smaller carriers. NTCA disagrees with CTIA's assertion that the

[3] NECA comments, p. 25.

Commission's Part 36 and Part 54 rules regarding high cost support should be consolidated and that carriers should submit cost data directly to USAC, rather than with NECA.[4] NECA currently provides USAC all of the data it receives from its member companies regarding HCL expense adjustments.[5] As NECA correctly identifies, their data review increases overall data quality and "[g]iven the Commission's concerns regarding potential waste, fraud and abuse of universal service funds, it would seem illogical at this stage to reduce the number of entities responsible for reviewing HCL data."[6]

B. Efforts to control waste in the USF program should include tightening ETC oversight and eliminating the identical support rule.

The Commission should reject Dobson Cellular's recommendation that "consumers in rural and high cost areas should have access to service from no fewer than 3 total ETCs" and that "areas where this level of competitive ETC entry has not been achieved should be identified and steps should be taken to achieve the target within a reasonable period of time."[7] NTCA has shown that the universal service fund is not intended to subsidize competition where competition would not otherwise exist.[8] This is a particularly valid consideration at this time when preventing waste and controlling unsustainable growth in the fund is a serious concern. Further, the Commission should eliminate the identical support rule, which allows CETCs, such as Dobson, to receive support based solely on an ILEC's costs regardless of a CETC's own costs to provide service in the ILEC's service area. Under the current rules, a CETC can receive a windfall at the expense of the USF program. Eliminating the identical support rule and

[4] CTIA comments, p. 7.
[5] NECA comments, p. 25.
[6] *Id* at 26.
[7] Dobson Cellular System comments, p. 13.
[8] *See* Dale Lehman, "Universal Service and the Myth of the Level Playing Field," August 2003, www.ntca.org/content_documents/uniserv_myth.pdf.

tightening the guidelines of ETC designations would be a significant step toward reducing the amount of waste in the universal service funding mechanisms.

C. The true-up process for high cost funds requires rural considerations.

NTCA agrees with the comments of GVNW, USTA, and OPASTCO/WTA which recommend that USAC should be allowed to charge interest and penalties for intentionally delinquent filers and/or payers, but not for good faith estimates based on best belief.[9] Carriers are unable to predict with exact precision their future needs. Imposing penalties for those carriers whose well-intentioned forecasts prove inaccurate is unfair and penalizes them for their inability to foresee unforeseeable events. As OPASTCO and WTA point out in their comments, "rural ILECs experience greater fluctuations in their investments and expenses than do larger ILECs, due in part to their lumpy investment patterns. This increases the likelihood that rural ILECs' good faith forecasts will deviate significantly from the costs they actually incur."[10] Rural ILECs should therefore not be required to pay interest on penalties as a result of good faith estimates that are subsequently found to be inaccurate.

D. High cost performance measures should reflect rural aspects.

Several commenters offered guidelines for performance measures for high cost support in response to the NPRM.[11] NTCA agrees with GVNW that there should be different measures for different components of the USF program.[12] We also agree with USAC on some of the relevant performance measures—namely, rates of telephone subscribership in urban vs. rural areas, and

---

[9] GVNW comments, p. 4; USTA comments, pp. 6-7; OPASTCO/WTA comments, p. 14.
[10] OPASTCO/WTA comments, p.14.
[11] NPRM ¶30; Mercatus Center at George Mason University comments, pp. 7, 9 (availability and price); GVNW comments, p. 13 (individualized measures); USAC comments, pp. 91-94 (including subscribership, number of households, urban/rural rate comparability and number of lines supported).
[12] GVNW comments, p. 13.

the number of households with telephones in study areas receiving high cost support.[13] These measures are readily available, and, more importantly, offer accurate insight into the degree of success of the high cost support program in rural areas.

III. COMMENTERS AGREED THAT THE COMMISSION SHOULD NOT ALTER THE LOW-INCOME SUPPORT PROGRAM SIGNIFICANTLY.

A. Document retention and audit requirements for the low-income program should not change from a three-year period.

NTCA agrees with USTA that the low-income mechanism does not need any broader auditing requirements than those that currently exist.[14] The current document retention period of three years is adequate and sufficient and should be tied to the time frame in which a company is subject to an audit. NTCA agrees with USTA that low-income support recipients should not be subject to an audit for any period beyond the timeframe for which they are required to keep records.[15] Extension of the current retention requirements to five years as the NPRM suggests[16] is not warranted. As USTA argues, limiting this time frame should encourage efficiency of the administrator. In addition, extending the document retention requirements for the purpose of auditing will demand additional time, money and resources. Extending the requirements from three to five years increases the document management and recall burden unnecessarily, by perhaps as much as 40%.

[13] USAC comments, pp. 91-93.
[14] USTA comments, pp. 5-6.
[15] *Id.*
[16] NPRM, ¶ 84.

B. The Commission should not require all ETCs to adopt TracFone's proposed Lifeline compliance procedures.

While NTCA shares the Commission's concerns raised in the NPRM[17] and TracFone's comments regarding potential fraud, waste or abuse within the Lifeline program,[18] NTCA does not support TracFone's proposal of implementing its specific compliance procedures industry-wide for avoiding such problems.[19] TracFone addresses the potential for abuse of the lifeline program in which there might be multiple supported services in one household.[20] NTCA agrees that this type of abuse would put an unwarranted strain on the fund and should be avoided, but differs with TracFone on the best means to accomplish this end. TracFone asserts that its internal procedures ensure that this type of abuse is not occurring with their customers.[21] TracFone compares its own database of Lifeline support recipients with new applications, and rejects new applications that would duplicate existing support.[22] TracFone urges the Commission to require all Eligible Telecommunications Carriers (ETCs) to follow these specific procedures.[23]

The Commission should disregard TracFone's recommendation to apply its Lifeline support compliance proposal to all carriers. First, the Commission is currently considering Tracfone's compliance proposal in a separate proceeding in conjunction with Tracfone's ETC

[17] *Id.*, ¶ ¶ 56, 93, 95.
[18] TracFone comments, p. 3.
[19] *Id.*, p. 11.
[20] *Id.*, p. 11.
[21] *Id.*, pp. 11-12.
[22] *Id.*, p. 12.
[23] *Id.*, p. 13.

designation. That docket is the appropriate forum for that discussion.[24] Second, TracFone has not demonstrated in this docket that its internal Lifeline compliance procedures are flexible enough to be applied as a mandatory requirement for all ETC companies. Each carrier, rather, should have the discretion to develop procedures for preventing this type of abuse that work based on its own billing system, operating procedure, and financial resources.

IV. INCREASED AUDITING OF THE HIGH COST AND LOW-INCOME USF PROGRAMS IS GENERALLY NOT NECESSARY.

The Commission seeks comment on whether to enhance USF auditing requirements.[25] Auditing is an integral part of USF oversight, and the FCC Office of Inspector General (OIG), USAC, NECA, and other federal and state offices share responsibility for auditing USF beneficiaries and contributors to "help protect the USF against waste, fraud and abuse."[26] Commenters agree with NTCA, however, that the high cost and low-income programs do not present as great a risk of abuse as does the E-rate program because high cost and low-income participants, especially rural ILECS, are already subject to scrutiny by OIG, USAC, NECA, RUS and state commissions, unlike many E-rate beneficiaries.[27] The Commission should, therefore, concentrate its oversight resources on the E-rate program and restrain from imposing new audit requirements on high cost and low-income USF program participants.

Additional audit requirements for high cost and low-income programs would further strain the Commission's already tight oversight resources. In its latest Semiannual Report to Congress, OIG states that its twelve-member staff closed 8 USF investigations in the second half

---

[24] *In the Matter of the Federal-State Joint Board on Universal Service and Petition for Tracfone Wireless, Inc. for Forbearance*, 47 U.S.C. §214(e)(A) and 47 C.F.R. §54.201(i), FCC 05-165, (rel. Sept. 8, 2005) (Forbearance Order).
[25] NPRM ¶ 76.
[26] USAC comment, pp. vi, vii.
[27] NTCA comment, p. 1-4; OPASTCO/WTA comment, p. 11-15.

of 2005, referred 35 cases to the Federal Bureau of Investigation and/or the U.S. Department of Justice, and carried over 48 investigations after September 30, 2005.[28] The OIG Report reveals that: 1) the number of USF complaints filed exceeded the number resolved and OIG's pending civil and criminal USF caseload is increasing; 2) the most egregious USF complaints arose from the E-rate program; 3) OIG evaluates USF complaints based on a risk assessment approach; and 4) OIG is referring USF investigations to other federal agencies and outside auditors due to its limited resources.[29]

As such, NTCA agrees with USTA's observation that "the current level of audits is sufficient for high cost and low income mechanisms," [30] especially compared to the E-rate mechanism. NTCA contends that the Commission should focus its attention and resources on auditing the E-rate program, and NTCA offers a few suggestions if the Commission believes additional audit guidelines are warranted. These guidelines concern the documentation retention period and the audit completion period.

A. The Commission should limit the review period for high cost and low-income program audits.

NTCA agrees with commenters who urge the Commission to tie the limitation period for conducting audits to the existing three-year document retention period.[31] Absent a demonstrated record of abuse or fraud, the five-year retention period mandated for E-rate programs would impose unnecessary costs to all USF recipients, especially small rural ILECs. Furthermore, the

[28] FCC Office of the Inspector General, Semiannual Report to Congress (April 1 – September 30, 2005) (rel. Dec. 14, 2005) (OIG Report). A copy of the OIG Report is located at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-262534A1.pdf. OIG reported that it is attempting to audit 100 E-rate beneficiaries through a three-way contract with USAC and a third-party contractor. Id. at 22.
[29] OIG Report, p. 3.
[30] USTA comment, p. 2-5.
[31] USTA comment, pp. 2-3; 5.

Commission or its authorized agent (USAC or NECA) can tailor the document retention and audit scope to a particular high cost or low income USF beneficiary or contributor as the circumstances warrant modification.

NTCA agrees with those commenters who ask the Commission to define the scope of high cost audits by encouraging the Commission to limit the time to complete the audit process to either six months or a maximum of one year.[32] Holding an audit open indefinitely can severely impact a carriers' ability to attract funding sources as, for example, venture capitalists may be unwilling to finance a carrier who is undergoing a USF audit until the audit is finished. By setting the outer limit within which all carriers are subject to audit, the Commission always retains the ability to modify individual time frames.

B. The Commission should target high risk USF beneficiaries and contributors using audit triggers.

NTCA renews its stance that the Commission should use audit triggers to identify high-risk recipients and contributors, and other commenters echo NTCA's call.[33] Many rural ILECs are already subject to internal and external audits from USAC, NECA, RUS and state commissions, and the Commission should direct USAC and its Office of Inspector General (OIG) to weigh this element in evaluating whether and when to audit a rural ILEC. OPASTCO/WTA asserts that broad audits aren't necessary for rural ILECS that are already subject to scrutiny by NECA, RUS, and state commissions. NECA details some of its audit requirements.[34] ILECs and CETCs do not currently bear equal audit burdens, and the Commission should view this inequality as a factor in determining whom should be audited and

[32] Verizon comment, pp. 29-30; GVNW Consulting comment, p. 18.
[33] OPASTCO/WTA comment, pp.3-9.
[34] NECA comment, p. 23-30.

how soon the audit should occur.[35] Audits should be triggered based on a combination of factors such as the USF amount received, the carriers' USF contribution base, the extent to which the carrier is already being audited, and status as a previous rule violator.

V. CONCLUSION

For all the reasons set forth herein and in NTCA's initial comments, the Commission should maintain the current high cost loop reporting and certification requirements, not consolidate study areas, use performance measures that reflect rural aspects, eliminate the identical support rule, and not assess penalties for inaccurate forecasts. The Commission should retain a three-year document retention and audit periods for low-income programs and should not impose TracFone's proposed Lifeline tracking system on all Lifeline providers. Finally, the Commission should focus its audit efforts and constrained resources where they are needed most – the E-rate program and high-risk USF beneficiaries and contributors. Audit review periods should be limited to six months and service providers should be allowed to participate in the audit review process.

Respectfully submitted,

NATIONAL TELECOMMUNICATIONS
COOPERATIVE ASSOCIATION

By: /s/ Daniel Mitchell
Daniel Mitchell
Karlen J. Reed
Its Attorneys

4121 Wilson Boulevard, 10th Floor
Arlington, VA 22203
703 351-2000

Richard J. Schadelbauer
Economist

Dorie Pickle
Analyst

December 19, 2005

[35] NTCA comment, p. 6-9.

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing Reply Comments of the National Telecommunications Cooperative Association in WC Docket No. 05-195, FCC 05-124 was served on this 19th day of December 2005 by first-class, United States mail, postage prepaid, or via electronic mail to the following persons on the attached list.

/s/ Rita H. Bolden
Rita H. Bolden

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW, Room 8-A201
Washington, D.C. 20554
Kevin.Martin@fcc.gov

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, D.C. 20554
Michael.Copps@fcc.gov

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, D.C. 20554
Jonathan.Adelstein@fcc.gov

Best Copy and Printing, Inc.
445 12th Street, SW
Room CY-B402
Washington, D.C. 20554
fcc@bcpiweb.com

Warren Firschein
Telecommunications Access Policy Division
Wireline Competition Bureau
445 12th Street, SW, Room 5-B442
Washington, D.C. 20554
Warren.Firschein@fcc.gov

Mika Savir
Telecommunications Access Policy Division
Wireline Competition Bureau
445 12th Street, SW, Room 5-B448
Washington, D.C. 20554
Mika.Savir@fcc.gov

Judith B. Herman
Federal Communications Commission
445 12th Street, SW, Room 1-C804
Washington, D.C. 20554
Judith-B.Herman@fcc.gov

Kristy L. LaLonde
OMB Desk Officer
NEOB
725 17th Street, NW, Room 10234
Washington, D.C. 20503
KristyL.LaLonde@omb.eop.gov

Dr. Jerry Ellig
Mercatus Center at George Mason University
3301 North Fairfax Drive, Suite 450
Arlington, VA 22201

Gary Rawson
State E-Rate Coordinators Alliance
Mississippi Department for Information Technology Services
301 North Lamar Street, Suite 508
Jackson, Mississippi 39201

Chicago Public Schools
c/o Office of Technology Services
125 South Clark Street
3rd Floor
Chicago, IL 60603

James D. Waggoner, Secretary
West Virginia Library Commission
1900 Kanawha Boulevard East
Charleston, WV 25305

Emily Sheketoff, Executive Director
American Library Association
1615 New Hampshire Ave., NW
Washington, D.C. 20009

Michael L. Glaser, Esq.
Michael D. Murphy, Esq.
Shughart Thomson & Kilroy, P.C.
1050 17th Street, Suite 2300
Denver, Colorado 80265

Eugene F. Maloney, Executive Vice-President and Corporate Counsel
Federated Investors, Inc.
Federated Investors Tower
1001 Liberty Avenue
Pittsburg, PA 15222-3779

Della Matthis, E-Rate/USF Coordinator
Alaska State Library & Dept. of Ed. and Early Development
344 W. 3rd Avenue, Suite 125
Anchorage, AK 99501

Robert C. Schoonmaker, President/Chief Executive
GVNW Consulting Inc.
P.O. Box 25969
Colorado Springs, CO 80936

Jeffry H. Smith, VP
GVNW Consulting Inc.
Western Region Division Manager Officer
Chairman of the Board
P.O. Box 2330
Tualatin, OR 97062

Daniel E. Riordan, President
On-Tech
53 Elm Place
Red Bank, NJ 07701

Greg Weisiger
14504 Bent Creek Court
Midlothian, VA 23112

Ronald L. Ripley, Senior Vice President and General Counsel
Dobson Cellular Systems, Inc.
14201 Wireless Way
Oklahoma City, OK 73134

Brian L. Talbott, Ph.D. Chairman, Board of Directors
Lisa M. Zaina, Chief Executive Officer
D. Scott Barash, Vice President and General Counsel
USAC
2000 L Street, NW, Suite 200
Washington, D.C. 20036

Winston E. Himsworth, Director
E-Rate Central
625 Locust Street, Suite 1
Garden City, NY 11530

Michael Altschul, Senior Vice President & General Counsel
Paul Garnett, Assistant Vice-President
Regulatory Affairs
Marlo Go, Staff Counsel
CTIA
1400 16th Street, NW, Suite 600
Washington, D.C. 20005

Blair A. Rosenthal, Esq.
Craig J. Brown, Esq.
Qwest Communications Internt'l. Inc.
607 14th Street, NW, Suite 950
Washington, D.C. 20005

Thomas Neal, Project Consultant
FSW, Inc.
2921 East 91st Street, Suite 200
Tulsa, OK 74137

Cynthia B. Miller, Senior Attorney
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Alexicon Telecommunications Consulting
2055 Anglo Drive, Suite 201
Colorado Springs, CO 80918

Tamar E. Finn, Esq.
Douglas D. Orvis II, Esq.
Swidler Berlin LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007

Mitchell F. Brecher, Esq.
Debra McGuire Mercer, Esq.
Greenberg Traurig, LLP
800 Connecticut Avenue, NW
Suite 500
Washington, D.C. 20006

Jack O'Connell, State Superintendent
of Public Instruction
California Department of Education
1430 N Street
Sacramento, CA 95814

Christopher M. Heimann, Esq.
Gary L. Phillips, Esq.
Paul K. Mancini, Esq.
SBC Communications Inc.
1401 I Street, NW
Suite 1100
Washington, D.C. 20005

Natelle Dietrich, Regulatory Economist
Marc D. Poston, Senior Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

American Association of School
Administrators
801 N. Quincy Street, Suite 700
Arlington, VA 22203

Tina Pidgeon, Vice President
Federal Regulatory Affairs
General Communication, Inc.
1130 17th Street, NW, Suite 410
Washington, D.C. 20036

G. Nanette Thompson, Vice President
Federal Policy
General Communication, Inc.
2550 Denali Street, Suite 1000
Anchorage, AK 99503

John T. Nakahata, Esq.
Brita D. Strandberg, Esq.
Bruce L. Gottlieb, Esq.
Harris, Wiltshire& Grannis LLP
1200 Eighteenth Street, NW
Washington, D.C. 20036

State Educational Technology Directors
Association
6213 N 22nd Street
Arlington, VA 22205

Scott Smyth, VP Legal and Regulatory
Trillion Partners, Inc.
9208 Waterford Centre Blvd., Suite 150
Austin, TX 78758

Rudolph J. Geist,
RJGLaw LLC
1010 Wayne Avenue, Suite 950
Silver Spring, MD 20910

Becky Rains
The Arkansas E-rate Work Group
P. O. Box 3155
Little Rock, AR 72203

John F. Jones, Vice President
Federal Regulatory
Nolan A. Moulle, Jr., Vice President
CenturyTel
100 CenturyTel Park Drive
Monroe, LA 71203

Office of Inspector General
Federal Communications Commission
44512th Street, SW
Washington, D.C. 20554

West Virginia Department of Education
Office of Technology and Information Systems
Building 6, Room 346
1900 Kanawha Blvd., East
Charleston, WV 25305

Dr. Anthony D. Machado
Miami-Dade County Public School
13135 SW 26th Street
Miami, FL 33175

Michael Casserly, Executive Director
Council of the Great City Schools
1301 Pennsylvania Avenue, NW
Suite 702
Washington, D.C. 20004

Bruce Burcat, Executive Director
Delaware Public Service
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, Delaware 19904

Stuart Polikoff
Stephen Pastorkovich
Brian Ford
OPASTCO
21 Dupont Circle, NW
Suite 700
Washington, D.C. 20036

Derrick Owens
WTA
317 Massachusetts Avenue, NE
Suite 300C
Washington, D.C. 20036

Richard A. Askoff, Esq.
Teresa Evert, Senior Regulatory Manager
National Exchange Carrier, Inc.
80 South Jefferson Road
Whippany, NJ 07981

Jon Bernstein, Esq.
Leslie Harris & Associates
2120 L Street, NW
Suite 400
Washington, D.C. 20037

Tom Fletcher, President
NASTD
The Council of State Governments
2760 Research Park Drive
P. O. Box 11910
Lexington, KY 40511-8482

Jeanne M. Fox, President
New Jersey Board of Public Utilities
Two Gateway Center
Newark, New Jersey 07102

Donald J. Manning, Vice President & General Counsel
Todd B. Lantor, Esq.
Chief Regulatory Counsel
Nextel Partners, Inc.
4500 Carillon Point
Kirkland, Washington 98033

Laura H. Phillips, Esq.
Jason E. Friedrich, Esq.
Drinker Biddle & Reath LLP
1500 K Street, NW
Suite 1100
Washington, D.C. 20005-1209

Mary McDermott, Senior Vice President
Legal and Regulatory Affairs
Virginia PCS Alliance
401 Spring Lane Plaza
Waynesboro, VA 22980

Debbie Sovereign, Esq.
Jane Kellogg, Esq.
Kellogg & Sovereign Consulting, LLC
P.O. Box 130
Allen, OK 7482